

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

REGINA PELLEGRINO, on behalf of herself,
all others similarly situated, and the general
public,

Plaintiff,

v.

THE PROCTER & GAMBLE CO.,

Defendant.

Civil Action No. 23-cv-10631

NOTICE OF MOTION AND MOTION TO TRANSFER OR STAY THIS ACTION

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law in Support of Motion to Transfer or Stay This Action, the Declaration of Kenneth L. Blackburn, the Declaration of Cortlin H. Lannin, and all accompanying documents submitted herewith, Defendant The Procter & Gamble Company (“P&G”), by its attorneys Covington & Burling LLP, will and hereby does move this Court, before the Honorable Kenneth M. Karas, United States District Judge, at the United States Courthouse, located at 300 Quarropas Street, White Plains, New York 10601, in accordance with the Court’s Scheduling Order (ECF. No. 19), for (1) an order pursuant to 28 U.S.C. § 1404(a) transferring this action to the United States District Court for the Northern District of California for the convenience of the parties and witnesses, and in the interests of justice, or, in the alternative, (2) an order staying this action until the resolution of a motion to dismiss a substantially similar case filed in the United States District Court for the Northern District of California, *Amado v. Procter & Gamble Co.*, No. 23-cv-6308 (N.D. Cal. filed Dec. 6, 2023).

PLEASE TAKE FURTHER NOTICE that oral argument will be on a date and at a time designated by the Court.

Dated: March 29, 2024
San Francisco, California

Respectfully submitted,

COVINGTON & BURLING LLP

By: s/ Cortlin H. Lannin
Cortlin H. Lannin

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*Attorneys for Defendant The Procter & Gamble
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cc: Jack Fitzgerald, Esq. (via ECF)
Attorney for Plaintiff